

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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MELISSA FIORE and BARBARA SELDIN, :  
Individually and on Behalf of All Others :  
Similarly Situated, :

Plaintiffs, :

v. :

INGENIOUS DESIGNS, L.L.C., and HSN, :  
Inc. :

Defendants. :  
----- X

No. Case 1:18-cv-07124

**PLAINTIFFS' NOTICE OF MOTION  
FOR APPROVAL OF ATTORNEYS'  
FEES, EXPENSES, AND SERVICE  
AWARDS TO CLASS  
REPRESENTATIVES**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Approval of Attorneys' Fees, Expenses, and Service Awards to Class Representatives, the Parties' Settlement Agreement, and the accompanying Declarations of Lead Class Counsel and Class Counsel and the exhibits thereto, Plaintiffs hereby move for an Order awarding them attorneys' fees of \$898,004.38, for reimbursement of costs and expenses of \$76,995.62, and awarding service awards to the named plaintiffs in the amount of \$5,000 each, and for such further relief as this Court deems just and proper. Defendants do not oppose this motion.

Attached to this motion are the following Exhibits:

Exhibit 1: Declaration of Christa L. Collins, Lead Counsel

Exhibit 2: Declaration of Rodney Max, Mediator

Exhibit 3: Declaration of Michelle La Count, Epiq Senior Project Manager

Exhibit 4: Composite Declarations of Class Counsel

Exhibit 5: Declaration of John A. Yanchunis, Attorney Fee Expert

In compliance with Local Civil Rule 23.1, the names and addresses of the applicants for the attorneys' fees are as follows:

COLLINS LAW PL  
433 Central Ave., 4<sup>th</sup> Floor  
St. Petersburg, Florida 33701

HARMON PARKER, P.A.  
110 North 11<sup>th</sup> Street - 2<sup>nd</sup> Floor  
Tampa, Florida 33602

GARDY & NOTIS, LLP  
126 East 56th Street  
8th Fl.  
New York, NY 10022

PARISI & HAVENS LLP  
100 Pine Street, Suite 1250  
San Francisco, California 94111

J. ANDREW MEYER, P.A.  
7431 114th Ave. #104  
Largo, Florida 33773

Each firm respectfully requests that the Court award the agreed upon amount of fees and expenses in the amount of \$975,000.00.

Date: July 19, 2021

Respectfully submitted,

**By Lead Counsel**

/s/ Christa Collins

Christa Collins PHV (FL Bar #038129)

[christa@clcclassactionlw.com](mailto:christa@clcclassactionlw.com)

COLLINS LAW PL

433 Central Ave.

4<sup>th</sup> Floor

St. Petersburg, Florida 33701

(727) 421-9589

**CERTIFICATE OF SERVICE**

I hereby certify that on July 19, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record in this case.

s/ Christa L. Collins